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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

TRACY ARNETT,  
DANIEL HOOKER,  
SANDRO DUVAL, AND  
SHELINA BISSETT,

Defendants.

CASE NO. 2:24-CR-00068 DC

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: November 5, 2024  
TIME: 9:30 a.m.  
COURT: Hon. Dena Coggins

The United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. This matter was set for a status conference on November 5, 2024, and time was excluded under the Speedy Trial Act through that date, pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) [Local Code T4]. This case was recently reassigned to the Honorable Dena Coggins.

2. The parties now jointly request that this Court continue the status conference to November 15, 2024, at 9:30 a.m., and exclude time from November 5, 2024 through November 15, 2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

3. The parties agree and stipulate, and request the Court find, the following:

a) The government has produced substantial discovery associated with this case that includes investigative reports and related documents in electronic form totaling over

1 approximately [2,000] pages, as well as several video and audio recordings and surveillance  
2 photographs. All of this discovery has been either produced directly to counsel and/or made  
3 available for inspection and copying.

4 b) Counsel for defendants desire additional time to review the discovery, consult  
5 with their clients, review the current charges, conduct investigation and research related to those  
6 charges, and otherwise prepare for trial.

7 c) Counsel for defendants believe that failure to grant the above-requested  
8 continuance would deny them the reasonable time necessary for effective preparation, taking into  
9 account the exercise of due diligence.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the  
12 case as requested outweigh the interest of the public and the defendants in a trial within the date  
13 prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
15 et seq., within which trial must commence, the time period of November 5, 2024, to November  
16 15, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local  
17 Code T4], because it results from a continuance granted by the Court at the defendants' request  
18 on the basis of the Court's finding that the ends of justice served by taking such action outweigh  
19 the best interest of the public and the defendants in a speedy trial.

20 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
21 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
22 must commence.

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IT IS SO STIPULATED.

Dated: October 11, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ WHITNEE GOINS  
WHITNEE GOINS  
MATTHEW THUESEN  
Assistant United States Attorneys

Dated: October 11, 2024

/s/ MARK J. REICHEL  
MARK J. REICHEL  
Counsel for Defendant  
TRACY ARNETT

Dated: October 11, 2024

/s/ LINDA M. PARISI  
LINDA M. PARISI  
Counsel for Defendant  
DANIEL HOOKER

Dated: October 11, 2024


/s/ MICHAEL E. HANSEN  
MICHAEL E. HANSEN  
Counsel for Defendant  
SANDRO DUVAL

Dated: October 11, 2024

/s/ DANICA MAZENKO  
DANICA MAZENKO  
Counsel for Defendant  
SHELINA BISSETT

IT IS SO ORDERED.

Dated: October 16, 2024

  
Dena Coggins  
United States District Judge